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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON REED,
 an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual and
 citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ~~[PROPOSED]~~
 ORDER TO EXTEND DEADLINE TO
 RESPOND TO SGB's MOTION TO
 STRIKE [ECF #380]**

[First Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Diamond”), and Defendant Schroeter Goldmark & Bender, P.S. (“SGB”) hereby stipulate to extend Diamond’s Response to SGB’s Motion to Strike [ECF 380] (the “Motion”), currently set for February 8, 2021, or a period of one (1) week, through February 15, 2021, and as grounds state as follows:

1. SGB Filed the Motion on January 25, 2021.
2. Between the filing of the Motion, and Diamond’s present response deadline, Diamond was required to respond to Requests for Production from both SGB and Defendant Reed Hein & Associates, as well as respond to SGB’s Interrogatories. In conjunction therewith, Diamond produced over 150,000 pages of documents.
3. In addition to the discovery responses, the parties have been engaged in ongoing meet and confer efforts regarding several other issues. Though the parties have been working diligently to resolve many of these issues, it is likely that the parties will seek the Court’s intervention in the relatively near future.
4. In order to adequately respond to SGB’s Motion, and the issues presented therein, the Diamond and SGB agree that Diamond’s deadline to file its response should be extend one (1) week, up to and including February 15, 2021.

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1 5. This is the Parties' first request for extension of this deadline, and it is not
2 intended to cause any delay or prejudice to any party. Defendant does not object to the requested
3 extension.

4 Dated this 5th day of February, 2021.

5 GREENSPOON MARDER LLP

LIPSON NEILSON, P.C.

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7 /s/ Phillip A. Silvestri, Esq.

/s/ Megan H. Thongham, Esq.

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10 Attorneys for Plaintiff

11 Diamond Resorts U.S. Collection

Development, LLC

Attorneys for Defendant

Schroeter, Goldmark & Bender, P.S.

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17 IT IS SO ORDERED

18 
UNITED STATES DISTRICT JUDGE

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20 DATED: February 8, 2021
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 5th day of December, 2021. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri

An employee of Greenspoon Marder LLP

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